

REMARKS

Claims 1-20, 26-54, and 58-65 remain pending under current examination, with claims 21-25, 55-57, and 66 being withdrawn. By this Amendment, Applicants amend claims 1-3, 5-7, 9-11, 26, 27, 29-31, 40, 41, 43-45, 58, and 62 to more clearly define the claimed invention, correct minor grammatical errors, and/or provide proper antecedent basis. Applicants also add new claims 66-77. Applicants submit that no new matter has been added by these amendments.

In the Office Action,¹ the Examiner rejected claims 1-20, 26-54, and 58-65 under 35 U.S.C. § 103(a) as being unpatentable over STEPHENS, Scott, "Supply Chain Council & Supply Chain Operations Reference (SCOR) Model Overview", May 1999, pp. 1-31 ("Stephens") in view of U.S. Patent No. 5,740,341 to Oota et al. ("Oota").

Applicants respectfully traverse the rejection under 35 U.S.C. § 103 because a *prima facie* case of obviousness has not been established.

"To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)." M.P.E.P. 2142, 8th Ed., Rev. 4 (October 2005), p. 2100-134.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

A *prima facie* case of obviousness has not been established because, among other things, neither Stephens nor Oota, nor their asserted combination, teach or suggest each and every element of Applicants' claims.

Independent claim 6, as amended, calls for a combination including, for example, "identifying flow data from the business collaboration data, the flow data including at least one of roles of the participants and information flow between the participants." The Examiner argues that page 17 of Stephens teaches this claim element stating that "the 'manage sourcing infrastructure' SCOR flow identifies flow data between the customer and supplier participants (e.g. vendor contracts) as well as their roles." See Office Action, p. 5. Applicants respectfully disagree.

The Examiner apparently considers the "vendor contracts" of Stephens to correspond to the "flow data" recited in claim 6. Even assuming this characterization is correct, page 17 of Stephens is silent with respect to "the flow data including at least one of roles of the participants and information flow between the participants," as recited in claim 6, because page 17 of Stephens does not identify any participants, roles of the participants, or information flow between any such participants.

Applicants direct the Examiner's attention to, for example, Figs. 3, 4A, 4B, and 5 of the present application. Consistent with these embodiments of the claimed invention, these figures identify the role that belongs to each participant, e.g., OEM, Importer, and Dealer, and also identify the information, e.g., vehicle specification, that flows to and from the participants. Unlike these exemplary embodiments, page 17 of Stephens does not identify any participants and, more specifically, fails to teach or suggest "identifying

flow data . . . including . . . **roles of the participants**,” and “identifying flow data . . . including . . . **information flow between the participants**,” as recited in claim 6 (emphasis added). Accordingly, Stephens fails to teach or suggest “identifying flow data from the business collaboration data, the flow data including at least one of roles of the participants and information flow between the participants,” as recited in claim 6.

Furthermore, other features of independent claim 6 are also not disclosed or suggested by Stephens. For example, claim 6 further recites the combination as including “electronically rendering, using the data processing system, a second graphical depiction derived from the first graphical depiction and the flow data.” The Examiner argues that page 14 of Stephens teaches this claim element stating that “SCORE illustrates the rendering a second graphical depiction of the first graphical depiction of the flow data on more than one level - from Level 1 to Level 2, Level 2 to Level 3, and as well, from Level 3 to Level 4.” See Office Action, p. 5. Applicants respectfully disagree.

Applicants respectfully direct the Examiner’s attention to, for example, Figs. 4A, 4B, and 5 of the present application. Consistent with these embodiments of the claimed invention, Fig. 4B derives from Fig. 4A, but Fig. 4B contains more information than Fig. 4A, for example, a Business Document (ref. no. 456) that flows from Importer to OEM. Applicants also note that Fig. 5 contains more examples of Business Documents flowing from one participant to another. In contrast to these exemplary embodiments, page 14 of Stephens does not electronically render or otherwise depict any flow data from one participant to another. Applicants interpret page 14 of Stephens as depicting activities

related to or within one participant. Accordingly, Stephens fails to teach or suggest “electronically rendering . . . a second graphical depiction derived from the first graphical depiction and the flow data,” as recited in claim 6.

In addition, the Examiner cited Oota as a teaching of “implementing a process design system using a computer system.” Office Action, p. 5. Even assuming the Examiner’s characterization of Oota is correct, Oota fails to cure the above-listed deficiencies of Stephens. That is, Oota, also, fails to teach or suggest “identifying flow data from the business collaboration data, the flow data including at least one of roles of the participants and information flow between the participants” and “electronically rendering, using the data processing system, a second graphical depiction derived from the first graphical depiction and the flow data,” as recited in claim 6. The Examiner cannot demonstrate otherwise.

For the foregoing reasons, the cited references, taken either alone or in any reasonable combination, fail to teach or suggest all the features of claim 6. In addition, independent claims 26 and 40, although different in scope, include one or more recitations similar to those discussed above in claim 6. Accordingly, for at least reasons similar to those given above with respect to claim 6, Stephens and Oota fail to teach or suggest all the features of claims 26 and 40. Moreover, for similar reasons, the cited art of record fails to disclose or suggest the claimed “interaction data” and the claimed “identifying” and “electronically deriving” or “electronically providing” or “electronically creating” features of claims 1, 58, and 62. Furthermore, dependent claims 2-5, 7-20,

27-39, 41-54, 59-61, and 63-65 are also allowable over Stephens and Oota at least by virtue of their dependence from allowable independent claims 1, 6, 26, 40, 58, or 62.

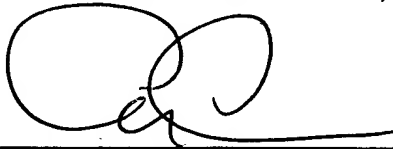
In view of the foregoing, Applicants submit that Stephens and Oota fail to support a *prima facie* case of obviousness. The rejection of claims 1-20, 26-54, and 58-65 under Section 103 as being obvious from Stephens and Oota is thus improper and should be withdrawn.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance all of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,
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